

CLEC CUTOVER ACTIVITY
February 1998

BellSouth Telecommunications, Inc.

Exhibit WKM-1

13 of 16

1	d,c,n	1100	na	1053	1056	3	3.00	2/27/98	2/27/98
4	d,c,n	800	na	1212	1229	17	4.25	2/27/98	2/27/98
2	d,c,n	1700	1730	1706	1715	9	4.50	2/23/98	2/23/98
17	d,c,n	2000	15	2011	2058	47	2.76	2/26/98	2/26/98
1	d,c	800	na	1028	1051	23	23.00	2/27/98	2/27/98
2	d,c	800	na	1028	1051	23	11.50	2/27/98	2/27/98
1	d,c,n	1700	na	1731	1733	2	2.00	2/23/98	2/23/98
1	d,c,n	1700	na	1731	1733	2	2.00	2/23/98	2/23/98
1	d,c,n	1700	na	1731	1733	2	2.00	2/23/98	2/23/98
1	d,c,n	1700	na	1731	1733	2	2.00	2/23/98	2/23/98
2	d,c,n	1500	na	1459	1501	2	1.00	2/26/98	2/26/98
9	d,c,n	1630	1830	1652	1706	14	1.56	2/23/98	2/23/98
4	d,c,n	1400	1600	1406	1409	3	0.75	2/23/98	2/23/98
2	d,c,n	730	930	737	741	4	2.00	2/23/98	2/23/98
4	d,c,n	1630	1830	1634	1639	5	1.25	2/23/98	2/23/98
5	d,c,n	900	1100	916	922	6	1.20	2/23/98	2/23/98
9	d,c,n	700	900	753	849	56	6.22	2/23/98	2/23/98
4	d,c,n	700	900	705	715	10	2.50	2/23/98	2/23/98
4	d,c,n	800	1000	809	812	3	0.75	2/23/98	2/23/98
8	d,c,n	1530	1730	1533	1618	45	5.63	2/23/98	2/23/98
1	d,c,n	800	1000	809	821	12	12.00	2/23/98	2/23/98
3	d,c,n	1400	1600	1406	1415	9	3.00	2/23/98	2/23/98
6	d,c,n	1000	1200	1029	1041	12	2.00	2/23/98	2/23/98
1	d,c,n	800	1000	804	807	3	3.00	2/23/98	2/23/98
2	d,c	900	1100	907	921	14	7.00	2/24/98	2/24/98
2	d,c	900	1100	910	920	10	5.00	2/24/98	2/24/98
2	d,c	900	1100	905	920	15	7.50	2/24/98	2/24/98
8	d,c,n	1630	1830	1629	1645	16	2.00	2/24/98	2/24/98
1	d,c,n	900	1100	910	915	5	5.00	2/24/98	2/24/98
1	d,c,n	1000	1200	1006	1009	3	3.00	2/24/98	2/24/98
3	d,c,n	700	900	705	708	3	1.00	2/24/98	2/24/98
3	d,c,n	900	1100	904	910	6	2.00	2/24/98	2/24/98
1	d,c,n	1000	1200	1004	1007	3	3.00	2/24/98	2/24/98
2	d,c	900	1100	904	920	16	8.00	2/24/98	2/24/98
1	d,c,n	900	1100	951	959	8	8.00	2/24/98	2/24/98
6	d,c,n	1000	1200	1004	1026	22	3.67	2/24/98	2/24/98
2	d,c,n	900	1100	907	912	5	2.50	2/24/98	2/24/98
3	d,c,n	730	930	732	740	8	2.67	2/24/98	2/24/98
2	d,c	900	1100	906	921	15	7.50	2/24/98	2/24/98
2	d,c,n	900	1100	906	920	14	7.00	2/24/98	2/24/98
6	d,c,n	1000	1200	1026	1039	13	2.17	2/24/98	2/24/98
14	d,c,n	630	830	647	712	25	1.79	2/24/98	2/24/98
QUANTITY	TYPE	SCHEDULED	SCHEDULED	ACTUAL	ACTUAL	TOTAL	TIME PER	DATE	DATE
LOOPS	ORDER	START TIME	COMPL. TIME	START TIME	COMPL. TIME	TIME	LOOP	DATE	DATE
12	d,c,n	600	800	618	634	16	1.33	2/24/98	2/24/98
3	d,c,n	730	930	736	743	7	2.33	2/25/98	2/25/98
2	d,c,n	1000	1200	947	950	3	1.50	2/25/98	2/25/98
9	d,c,n	700	900	723	730	7	0.78	2/26/98	2/26/98
1	d,c,n	1530	1730	1539	1546	7	7.00	2/26/98	2/26/98
5	d,c,n	600	800	607	612	5	1.00	2/26/98	2/26/98
5	d,c,n	1530	1730	1540	1547	7	1.40	2/26/98	2/26/98
2	d,c,n	900	1100	903	933	30	15.00	2/26/98	2/26/98

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BellSouth Telecommunications, Inc.

Exhibit WKM-1

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1	d,c,n	1530	1730	1539	1546	7	7.00	2/26/98	2/26/98
9	d,c,n	1700	1900	1709	1725	16	1.78	2/26/98	2/26/98
1	d,c,n	1530	1730	1539	1546	7	7.00	2/26/98	2/26/98
1	d,c,n	1700	1900	1718	1723	5	5.00	2/26/98	2/26/98
4	d,c,n	1600	1800	1610	1638	28	7.00	2/27/98	2/27/98
8	d,c,n	1700	1900	1708	1721	13	1.63	2/27/98	2/27/98
3	d,c,n	1400	1600	1419	1423	4	1.33	2/27/98	2/27/98
5	d,c,n	1700	1900	1705	1721	16	3.20	2/27/98	2/27/98
1	d,c,n	1500	1700	1504	1514	10	10.00	2/27/98	2/27/98
7	d,c,n	1500	1700	1500	1515	15	2.14	2/27/98	2/27/98
1	d,c,n	1500	1700	1504	1506	2	2.00	2/27/98	2/27/98
1	d,c,n	900	1100	909	911	2	2.00	2/27/98	2/27/98
990						3726			
<p>TOTAL ITEMS (JAN. & FEB.) = 2,595</p> <p>TOTAL MINUTES (JAN. & FEB.) = 10,731</p> <p>AVERAGE CUTOVER/ITEM = 4.1 MINUTES</p>									

DATE	START	FINISH	TOTAL MINS	TOTAL LINES
1/5/98	1738	1740	2	16
1/5/98	1620	1628	8	10
1/5/98	1727	1731	4	2
1/5/98	1727	1731	1	1
1/7/98	1137	1140	3	7
1/7/98	1140	1144	4	5
1/7/98	1144	1159	15	22
1/7/98	1900	1930	30	20
1/7/98	1729	1741	13	17
1/7/98	1745	1757	12	19
1/8/98	1934	2021	47	101
1/9/98	1715	1717	2	1
1/9/98	1825	1832	7	16
1/9/98	953	1009	16	4
1/9/98	1947	1952	5	19
1/9/98	1945	2144	119	130
1/12/98	1757	1818	21	12
1/12/98	1000	1002	2	1
1/13/98	1752	1803	11	30
1/14/98	1604	1617	13	22
1/14/98	1837	1843	6	8
1/15/98	2047	2051	4	1
1/15/98	706	710	4	8
1/16/98	1707	1734	27	73
1/16/98	1639	1659	20	50
1/16/98	1613	1628	15	31
1/20/98	909	916	7	13
1/21/98	1921	1925	4	3
1/21/98	2102	2107	5	4
1/22/98	1851	1901	10	22
1/23/98	1203	1209	6	17
1/23/98	1716	1727	11	18
1/26/98	825	842	17	11
1/26/98	1700	1702	2	18
1/27/98	1557	1615	18	13
1/29/98	1718	1726	8	23
1/29/98	1809	1813	4	9
1/29/98	1905	1906	1	1
1/30/98	1610	1629	19	18
1/30/98	1709	1714	5	11
Total			528	807
Min per line				0.654

DATE	START	FINISH	TOTAL MINS	TOTAL LINES
2/2/98	1732	1742	10	25
2/3/98	1452	1505	13	40
2/4/98	907	922	15	23
2/4/98	502	507	5	15
2/4/98	1700	1706	6	24
2/9/98	1046	1058	3	12
2/9/98	513	515	2	4
2/11/98	1511	1514	3	3
2/17/98	1723	1729	6	14
2/16/98	501	539	38	81
2/13/98	1745	1757	12	15
2/12/98	1706	1707	1	1
2/12/98	1715	1719	4	6
2/12/98	405	415	10	13
2/11/98	311	314	3	3
2/9/98	1046	1058	12	17
2/18/98	517	522	5	6
2/18/98	1609	1632	23	17
2/18/98	2000	2013	13	1
2/19/98	1216	1218	2	3
2/19/98	1800	1801	1	1
2/19/98	1810	1812	2	3
2/19/98	2026	2045	19	28
2/20/98	1541	1555	14	21
2/23/98	1357	1358	1	1
2/23/98	1737	1740	3	4
2/23/98	1718	1720	2	2
2/25/98	640	808	88	117
2/25/98	1817	1823	6	13
2/26/98	1717	1725	8	10
2/26/98	552	559	7	7
2/25/98	1017	1021	4	1
2/26/98	1714	1719	5	3
2/27/98	633	733	60	83
Total			406	617
Min per line				0.658
JANUARY			528	807
FEBRUARY			406	617
TOTAL			934	1424
AVG. RCF ACTIVATION/LINE = 934/1424 = 0.66 MIN. (39 SECONDS)				

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Application of BellSouth)	Docket No. 98-121
Corporation to Provide)	
In-Region, InterLATA Long)	
Distance Services Under)	
Section 271 of the)	
Telecommunications Act of 1996)	

REPLY AFFIDAVIT JOHN W. PUTNAM

John W. Putnam, being duly sworn, deposes and says:

I. INTRODUCTION

1. My name is John W. Putnam. I am a partner in the firm of Ernst & Young LLP. On July 9, 1998, I filed an affidavit on behalf of BellSouth as part of the Second Application of BellSouth Corporation to Provide In-Region, InterLATA Long Distance Services Under Section 271 of the Telecommunications Act of 1996, Docket 98-121 ("July 9, 1998 Affidavit").

II. PURPOSE OF THE AFFIDAVIT

2. This affidavit responds to the of Evaluation of the United States Department of Justice which was filed August 19, 1998 in the above named proceeding, to the extent that the Evaluation refers to my July 9, 1998 Affidavit or its attachment, the Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998. I will also respond to related issues raised by AT&T and MCI in their filings in this proceeding.

III. MOST OF THE INFORMATION REQUESTED IN THE DEPARTMENT OF JUSTICE COMMENTS CONCERNING THE WORK OF ERNST & YOUNG WAS ALREADY PROVIDED IN THE AFFIDAVIT AND ITS ATTACHMENT

3. The form of reporting used in the Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998 and the related July 9, 1998 Affidavit were specifically designed to provide the Federal Communications Commission and all parties in the proceeding the types of information that the Department of Justice requests on page 36 of its Evaluation when it states, *"To evaluate properly and determine what weight to give a third-party review, we need to have a clear and complete understanding of the scope of the work, including: how and by whom it was defined; the qualifications of the organization and of the individual persons who designed, conducted, and analyzed the tests; and the tests performed that form the basis for the conclusions reached, including the type, mix, and volume of test transactions submitted."*

4. With respect to the need of the Department of Justice to understand the scope of the work, the BellSouth assertions in the Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998 provide the precise scope of the OSS areas that were tested. Each of the BellSouth assertions was tested to determine whether the assertion was consistent with the actual performance of the systems.
5. With respect to qualifications of the organization that designed, conducted and analyzed the tests, my July 9, 1998 Affidavit (in ¶ 2, App. A, Tab 15) describes Ernst & Young LLP as "part of a worldwide professional services organization that provides audit, tax and management consulting services." In fact, as of the last reporting period, Ernst & Young audited more companies that are registered with the Securities and Exchange Commission than any other firm. The July 9, 1998 Affidavit, ¶¶ 2-7 and ¶ 18, describes my career experience as an auditor including my leadership role in the performance of audits required by the Federal Communications Commission, and states that I led a team of professionals in the conduct of the work. As a partner leading the engagement I am responsible for the design and conduct of the testing as well as for assuring that the work conforms to the requirements of Ernst & Young and of the American Institute of Certified Public Accountants. In ¶ 19 of the July 9, 1998 Affidavit, I describe the skills and qualifications of the other members of the team and made special reference to the discipline of computer auditing which was represented on the team.

6. The only area of information now requested by the Department of Justice that was not provided in my July 9, 1998 Affidavit and its attachments has to do with the detail of tests and documentation of test results that support and underlie the thirteen pages of assertions made in the Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998. The Attestation Standards of the American Institute of Certified Public Accountants do not call for the reporting of testing detail, nor is such information customarily reported in practice. Likewise, the Securities and Exchange Commission's process of requiring audited financial statements and registration statements includes only the inclusion of the auditor's opinion with the audited statements and does not require the submission of the workpapers that document the actual tests that support the auditor's opinion. Nevertheless, the workpapers of Ernst & Young contain the information at the test level of detail and in response to the Justice Department's articulation of its preferences, they are supplied as a confidential attachment to this affidavit.
7. The issues of the efficiency, effectiveness, and adequacy of the existing support processes and functions raised by the justice department, while not included in the statement of operating support systems performance and operational readiness and not covered by my affidavit, are addressed in William Stacy's reply affidavit, and other BellSouth submissions (Reply App. Tab 11).

**IV. AT&T'S CRITICISMS OF THE ERNST & YOUNG ATTESTATION ARE
BASED UPON ILLOGIC, MISINFORMATION AND OUTDATED
ARGUEMENTS**

8. AT&T claims that "The Ernst & Young 'Certification' or 'Attestation' Provides No Support For BellSouth's Claim That Its Systems are Operationally Ready." (Bradbury pg. 139) The Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998 sets forth specific statements about the capabilities and performance of BellSouth's systems and a definition of operational readiness that have been subjected to audit testing in accordance with standards of the American Institute of Certified Public Accountants. It is clearly incorrect to say that this report "Provides No Support For BellSouth's Claim That Its Systems Are Operationally Ready." (Bradbury pg. 139)
9. AT&T states that independent third party reviews are appropriate for consideration only if CLECS are not using particular OSS functions because of their own business decisions, rather than the unavailability of OSS functions. (Bradbury ¶ 279) It appears, however, that the availability of OSS is very much at issue in this proceeding. In addition, there is no bright line distinction between independent third party reviews and commercial usage in this instance, because much of Ernst & Young's testing used actual commercial transactions. The audited information

therefore is appropriate for consideration here even under AT&T's suggested standard.

10. AT&T states that "the Ernst & Young 'attestation' does not reflect a truly independent third-party review [because according to AT&T] the test environment was set up and controlled by BellSouth." (Bradbury ¶ 280) The auditing profession customarily performs audits on client systems and client financial information at client locations and has developed a body of professional standards for operating in just such a context. Ernst & Young is independent under standards of the American Institute of Certified Public Accountants and conducted its work accordingly.
11. AT&T states that the "attestation" is "defective" or "unreliable" because it did not include more assertions than it did. (Bradbury ¶¶ 281, 282) The report should be read as evidence for the assertions it covers. The report is not defective merely because BellSouth addresses other issues in the proceeding with other sources of information. To the contrary, the report presents a variety of specific statements about system performance and subjected them to specific audit tests.
12. AT&T's statements that "Ernst & Young reviewed the adequacy of the May 1997 IBM report on BellSouth's volume testing process" and that "based on their review of the of the IBM report, Ernst & Young found that IBM had conducted an adequate review of the volume testing approach used to validate BellSouth's CLEC interfaces" (Bradbury ¶ 319) are false. These

misrepresentations by AT&T suggest why audited information is useful in this proceeding. The Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998 provide the specific assertions that Ernst & Young tested and reported upon. My July 9, 1998 Affidavit at ¶ 17 also addressed this point in its description of the nature of the project.

13. AT&T's concerns about the estimates of future order volumes (Bradbury ¶319) are based upon outdated information. Estimates of BellSouth's CLEC interface future order volumes have inherent uncertainties because they are predicated on future business growth and fundamental business decisions of CLECs that are not controlled by BellSouth. The approach used in the Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998 was to specifically describe the volumes used in the testing and verify that such levels of performance were achieved. The Ernst & Young workpapers referred to by AT&T as "significant" (Bradbury ¶ 319) supported a volume test referred to in a previous BellSouth Statement dated February 11, 1998, not the more recent May 18, 1998 that was filed in this proceeding. Similarly, AT&T's concerns over LENS tested capacity of 2000 orders per day and 150 orders per hour (Bradbury ¶ 319) are mooted by the tested capacity reported in the Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998. That capacity is 8,200 LENS orders in a 20 hour period, an average

processing level of over 400 orders per hour. (Putnam Affidavit attachment pg. 14)

V. THE COMMENTS OF MCI REGARDING EVIDENCE OF EDI ORDERING ARE INCORRECT.

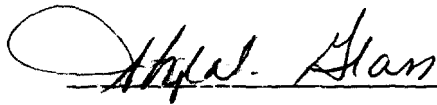
14. MCI states that "BellSouth fails to present even a single piece of evidence of any sort showing that CLECs can successfully transmit UNE orders across its EDI interface" (MCI Comments pg. 42). To the contrary, the audited Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of May 18, 1998 states specifically that the CLEC EDI interface provides the ability for a CLEC to perform electronic ordering of unbundled loops, ports, and interim number portability. (Putnam Affidavit attachment pg. 6.) Ernst & Young successfully tested this capability using test transactions since, at the time the testing was performed, there was little or no commercial order activity for unbundled network elements. The rebuttal affidavit of William Stacy addresses the current levels of commercial order activity for unbundled network elements.

I hereby swear that the foregoing is true and correct to the best of my information and belief.



John W. Putnam
Partner
Ernst & Young LLP

Subscribed and sworn to before me this 25
day of August, 1998.



Notary Public

Notary Public, Fulton County, GA
My Commission Expires Sept. 10, 2000

Confidential Attachments – Putnam Reply
Not for Public Inspection

Before the
-- FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Application by BellSouth Corporation,)	CC Docket No. 98-121
BellSouth Telecommunications, Inc.,)	
and BellSouth Long Distance, Inc., for)	
Provision of In-Region, InterLATA)	
Services in Louisiana)	

**REPLY AFFIDAVIT OF VALERIE K. SAPP
ON BEHALF OF BELL SOUTH**

STATE OF Georgia
COUNTY OF Fulton

I, Valerie K. Sapp, being first duly sworn upon oath, do hereby depose and state:

1. My name is Valerie K. Sapp. My business address is 600 North 19 Street, Birmingham, Alabama 35203. I am employed by BellSouth Telecommunications, Inc. as a Manager-Interconnection Services. I am the same Valerie K. Sapp who filed an affidavit in this proceeding on July 9, 1998.
2. This affidavit is in response to allegations raised by parties in this proceeding regarding the means by which BellSouth has satisfied the requirements of the competitive checklist set forth in Section 271(c)(2)(B)(vii) of the Telecommunications Act of 1996 (the Act) relating to the provision of 911 services, insofar as these allegations have not already been addressed in my initial affidavit.

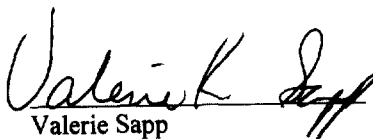
3. Cox alleges that BST describes a process for 911 database maintenance under which BST's records are corrected automatically while leaving CLECs to depend on faxed inquiries to amend errors. Cox at 3. Cox further alleges that BST has not demonstrated it maintains the 911 database entries for CLECs' end users with the same accuracy and reliability that it maintains the database entries for its own customers. Cox's allegations are without merit.
4. My initial affidavit, and the affidavit of William Marczak explained that BST and Independent Company updates, as well as CLEC updates, are mechanically transmitted to SCC daily. Sapp Aff. ¶ 11 (App. A, Tab 17); Marczak Aff. ¶¶ 7-13 (App. A, Tab 12). SCC is the unaffiliated contractor that maintains the 911 database for BST. All update files are processed nightly by SCC. Records that fail validity edits are marked with an error code and written to an error file. On the following morning, BST's error file is received by the SCC Analyst for investigation and correction on BST's behalf, in accordance with the BST/SCC contract. In the same time frame, other data providers receive their error files by fax for investigation and correction. Although BellSouth cannot correct data for other companies, CLECS and other data providers have the same option of using a vendor to provide these services on their behalf.
5. Detailed 911 guidelines and procedures are included in BellSouth's 9-1-1 Local Exchange Carrier Guide for Facility-Based Providers. This Guide is provided to all facilities-based providers that have signed an interconnection agreement with

BellSouth. The issues referred to by Cox that were allegedly ignored in the original Louisiana 271 proceeding, are answered in the Guide. In addition, the Cox Account Team and I are always available to answer questions and provide additional information, as necessary. To date, all information requested by Cox concerning 911, has been provided to them.

6. Although Cox and BellSouth have recently signed an interim SGAT Agreement (attached as VKS - R1), and are presently in the process of negotiating an interconnection agreement, Cox is not yet in a position to place local service orders, i.e., its switch is not operable, and certainly Cox has had no experiences that could possibly substantiate its allegations of discriminatory access. This is further substantiated by the fact that none of the 25 facilities-based providers in BellSouth's nine state region who currently have records in the database, including the 5 operating in Louisiana, have made allegations in this proceeding related to the 911 service they are receiving.
7. This concludes my affidavit.


I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 25, 1998.


Valerie Sapp

STATE OF GEORGIA
COUNTY OF FULTON

Subscribed and sworn to before me
this 25 day of August, 1998.


Notary Public

NOTARY PUBLIC, ALABAMA STATE AT LARGE
MY COMMISSION EXPIRES NOVEMBER 26, 2001

EXHIBIT VKS - R1

**Notice of Interim Agreement to Adopt the Statement of Generally Available
Terms and Conditions**

**Cox and BellSouth
Louisiana**

**Notice of Interim Agreement to Adopt the
Statement of Generally Available Terms and Conditions**

Louisiana

This Notice of Interim Agreement ("Notice") is made by and between Cox Louisiana Telcom II, L.L.C. ("Cox"), organized under the laws of the State of Delaware, on behalf of itself and its successors and assigns, and BellSouth Telecommunications, Inc. ("BellSouth"), a Georgia corporation, having an office at 675 W. Peachtree Street, Atlanta, Georgia, 30375, on behalf of itself and its successors and assigns.

WHEREAS, the Telecommunications act of 1996 (the "Act") was signed into law on February 8, 1998;

WHEREAS, Cox has requested that BellSouth engage in negotiations with Cox for the purpose of reaching an interconnection agreement pursuant to Section 252 of the Act;

WHEREAS, Cox and BellSouth are currently engaged in such negotiations, and have not finalized such negotiations or executed an agreement;

WHEREAS, to prepare for its entry into the telecommunications marketplace in Louisiana, Cox desires to conduct certain preliminary activities before offering telecommunications services to the public;

WHEREAS, the activities Cox desires to accomplish require Cox to interconnect with BellSouth's network, to order various services offered by BellSouth and to gain access to BellSouth's unbundled network elements;

WHEREAS, Cox may conduct these preliminary activities by electing on an interim basis, until a final agreement is executed between the two companies, to avail itself of the terms and conditions available in BellSouth's Statement of Generally Available Terms and Conditions ("Statement") approved by the Louisiana Public Service Commission;

WHEREAS, both parties intend for this election to be interim only, and both acknowledge that Cox's use of the Statement shall not be deemed to waive any right it may have or constitute any admission or denial of any fact or position it has or may take in the ongoing negotiations and/or any arbitration or contest before the Louisiana Public Service Commission or any other forum of any type whatsoever, private or public.

NOW, THEREFORE, by this Notice and in consideration of the promises and

mutual covenants contained herein, Cox and BellSouth state the following:

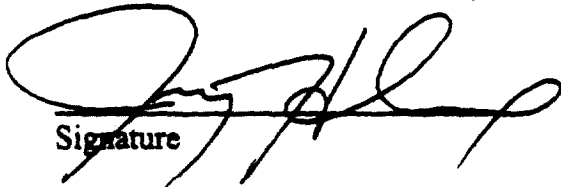
1. Cox and BellSouth agree to adopt the Statement of Generally Available Terms and Conditions as an interim agreement for the provision of all services and obligations contained within the Statement until they finalize their negotiations and/or arbitration and execute a final agreement. The Statement is attached hereto as Exhibit 1 and incorporated herein by this reference.

2. The term of this Agreement shall be for remainder of the term of the Statement or until such time as Cox and BellSouth complete the negotiations or arbitration of an interconnection agreement pursuant to Section 252 of the Act, whichever time period is shorter.

IN WITNESS WHEREOF, the Parties' authorized representatives have executed this Notice of Interim Agreement to Adopt the Statement of Generally Available Terms and Conditions --

Louisiana

BellSouth Telecommunications, Inc.

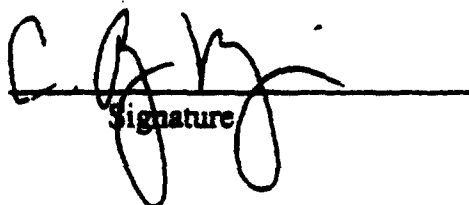

Signature

Jerry Hendrix
Name

Director - Interconnection Services/Pricing
Title

7/13/98
Date

Cox Louisiana Telcom II, L.L.C.


Signature

Ray Nagin
Name

President
Title

July 8, 1998
Date

BEFORE THE

In the Matter of)

Application of BellSouth)

Corporation to Provide)

In-Region, InterLATA Long)

Distance Services Under)

Section 271 of the

Telecommunications Act of 1996

REPLY AFFIDAVIT OF DAVID SCOLLARD

David P. Scollard, being duly sworn, deposes and says:

1. I am David P. Scollard, Manager, Wholesale Billing at BellSouth Billing, Inc. (BBI). Having provided an affidavit in BellSouth's 271 application before the FCC, I herein respond to comments received on the billing portion of that application.

2. AT&T affiants Bradbury (paragraphs 20 - 21) and Hamman (paragraphs 13 - 26) both claim that the Access Daily Usage File (ADUF) is deficient in some way. As stated in my previous affidavit in this proceeding, BellSouth currently provides records for all inter-state and intra-state toll calls originating from or terminating to unbundled switch ports, with one exception. Because BellSouth does not currently bill terminating intra-state access associated with the intra-LATA toll calls it carries, switch recordings